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10 Attorneys for Defendant
11 SIEMENS PRODUCT LIFECYCLE MANAGEMENT
12 SOFTWARE INC.
13 (formerly known as UGS CORP.)

14
15 IN THE UNITED STATES DISTRICT COURT FOR THE
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO/OAKLAND DIVISION

18
19 12 VANESSA FLINT, Individually and On Behalf
20 of All Others Similarly Situated,

21 Plaintiffs,

22 v.
23 15 UGS CORPORATION and DOES 1 through
24 100, inclusive,

25 Defendants.

26 Case No. C 07 4640 MJJ

27 (Removed from San Francisco Superior
Court on September 7, 2007; Case
No:CGC-07-465695)

28 **DECLARATION OF JOHN
CHRISTOPHER BROSZ IN SUPPORT
OF MOTION TO TRANSFER VENUE**

29 Date: December 4, 2007
30 Time: 9:30 a.m.
31 Courtroom: 11, 19th Floor
32 Judge: Hon. Martin J. Jenkins

33 I, John Christopher Brosz, hereby declare as follows:

34 1. I am the Vice-President of Technical Operations for Siemens Product Lifecycle
35 Management Software Inc. ("Siemens PLM Software"). I have personal knowledge of the
36 matters stated herein and if called as a witness could and would competently testify
37 thereto. I have worked as the Vice-President of Technical Operations for 6 years. As the
38 Vice-President of Technical Operations my duties include management of the Technical
39 Operation Group, indirectly including its applications engineers, within the Products &

Operations Organization of Siemens PLM Software

2. As Vice-President of Technical Operations, I am generally familiar with the duties of applications engineers who work for Siemens PLM Software in the State of California. There are only three applications engineers who work for Siemens PLM Software in Northern California. None of the applications engineers who work for Siemens PLM Software in Northern California perform technical writing duties. None of the applications engineers who work for Siemens PLM Software in Northern California write instructional material for print or onscreen media or other instructional material intended to be read by customers.

Executed this 12th day of November, 2007, at Cypress, California. I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing, to the best of my knowledge, is true and correct.


John Christopher Brosz

1 **CERTIFICATE OF SERVICE**

2

3 **CASE:** Vanessa Flint v. UGS Corporation
 4 **CASE NO.:** USDC-NDCA : C 07 4640 MJJ
 5 **CLIENT:**

6 I, xxxxx, declare that I am employed with the law firm of Jackson, Lewis, whose address
 7 is 199 Fremont Street, 10th Floor, San Francisco, California, 94105; I am over the age of eighteen
 8 (18) years and am not a party to this action.

9 On November 12, 2007, I served the attached document(s):

10 **DOCUMENT TITLE**

11 in this action by placing true and correct copies thereof, enclosed in sealed envelope(s) addressed
 12 as follows:

13 Robert C. Schubert, Esq.
 14 Juden Justice Reed, Esq.
 15 Miranda P. Kolbe, Esq.
 16 Schubert & Reed LLP
 17 Three Embarcadero Center, Suite 1650
 18 San Francisco, CA 94111
 19 Telephone: 415.788.4220
 20 Facsimile: 415.788.0161

21 [] **BY MAIL:** United States Postal Service by placing sealed envelopes with the postage
 22 thereon fully prepaid, placed for collection and mailing on this date, following ordinary
 23 business practices, in the United States mail at San Francisco, California.

24 [] **BY HAND DELIVERY:** I caused such envelope(s) to be delivered by hand to the above
 25 address.

26 [] **BY OVERNIGHT DELIVERY:** I caused such envelope(s) to be delivered to the above
 27 address within 24 hours by overnight delivery service.

28 [] **BY FACSIMILE:** I caused such documents to be transmitted by facsimile to the
 29 telephone number(s) indicated above.

30 I declare that I am employed in the office of a member of the bar of this Court at whose
 31 direction the service was made.

32 Executed on November 12, 2007, at San Francisco, California.

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Mary Stoner